

1
2 Presented to the Court by the foreman of the
3 Grand Jury in open Court, in the presence of
4 the Grand Jury and FILED in the U.S.
5 DISTRICT COURT at Seattle, Washington.

6
7 February 28 2024
8 Ravi Subramanian, Clerk
9 By J. S. Deputy

10
11
12 UNITED STATES DISTRICT COURT FOR THE
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE

15
16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 ROBEL KELETA GOITOM,
20 Defendant.

21 NO. CR 24 - 040 RSL
22
23 INDICTMENT

24
25 The Grand Jury charges that:

26
27 **COUNT 1**

(Unlawful Possession of a Firearm)

On or about October 1, 2023, in King County, within the Western District of Washington, ROBEL KELETA GOITOM, knowing he had been convicted of the following crimes punishable by a term of imprisonment exceeding one year:

- i. *Felon in Possession of a Firearm and Bank Fraud*, in the Western District of Washington, under case number CR17-132-JCC, on or about July 17, 2018; and

1 ii. *Unlawful Possession of a Firearm in the Second Degree* and three
2 counts of *Felony Harassment*, in the King County Superior Court, under
3 case number 19-1-05963-6, on or about December 17, 2021;
4 did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
5 is: a Glock Model 19 9mm semi-automatic pistol, that had been shipped and transported
in interstate and foreign commerce.

6 All in violation of Title 18, United States Code, Section 922(g)(1).

7 **FORFEITURE ALLEGATION**

8 The allegations contained in Count 1 of this Indictment are hereby realleged and
9 incorporated by reference for the purpose of alleging forfeiture.

10 Upon conviction of the offense alleged in Count 1, ROBEL KELETA GOITOM,
11 shall forfeit to the United States, pursuant to Title 18, United States Code, Section
12 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms or
13 ammunition that were used or involved in the offense.

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or,
 - e. has been commingled with other property which cannot be divided without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).

A TRUE BILL:

DATED: 2/28/24

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

TESSA M. GORMAN
United States Attorney

FTODD GREENBERG
Assistant United States Attorney

ERIKA J. EVANS
Assistant United States Attorney